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April 3, 2025

**VIA ECF ELECTRONIC FILING**

Hon. Valerie Figueredo, U.S.M.J.  
Southern District of New York  
United States Courthouse  
500 Pearl St., Courtroom 17A  
New York, New York 10007

**Re: Manny Pastreich, as Trustee, et al. v. Red Coats, Inc., et al.**  
**Civil Action No. 21-cv-05557**  
**Civil Action No. 23-cv-2280**

Dear Judge Figueredo:

Our firm represents the Plaintiffs in the above-referenced matter. Please accept this joint letter on behalf of Plaintiffs and Defendant Red Coats, Inc. (in its own name and doing business as Admiral Security and Cavalier Services) (collectively the “Defendant”). This correspondence is being filed in the two companion matters with these parties before Your Honor.

**1. 2016 Audit and ESS Contributions Case – 21-cv-0557**

Presently, the deadline to move for summary judgment in this matter is Monday, April, 7, 2025. The parties jointly ask that this deadline be moved two (2) weeks, and the deadlines for the opposition and reply papers adjusted accordingly.

The undersigned has spoken with Defendant’s new counsel in this matter, and the parties believe it is beneficial for Defendant to review the current ESS reports and 2016 Audit findings, and provide rebuttal information and/or payment that may reduce, or remove, the outstanding balances. The Funds, while prepared to proceed with the Motion, and Defendant would greatly prefer to resolve these issues amicably and without Court intervention, if possible.

**2. 2017-2023 Funds Audit Case – 23-cv-2280**

Regarding this audit, Defendant has provided the complete audit documents, and findings were issued in late 2024. Defendant is working with its new counsel to provide rebuttals to these audit findings, and will produce same shortly. The parties ask to provide a status update to the Court on progress in thirty (30) days.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact the parties.

Respectfully submitted,

/s/ Samuel R. Bloom  
Samuel R. Bloom

cc: Steven A. Sutro, Esq. (via ECF)

## MEMO ENDORSED

  
**HON. VALERIE FIGUEREDO**  
**UNITED STATES MAGISTRATE JUDGE**

Dated: 4/7/2025

The deadline to move for summary judgment in 21-CV-5557 is hereby extended two weeks, to April 21, 2025, and the deadlines for the opposition and reply papers are extended accordingly. With regards to 23-CV-2280, the parties are directed to provide a joint status update by May 7, 2025.

The Clerk of Court is directed to terminate the motion at ECF No. 89 in 21-CV-5557.